

1 Jason C. Murray (State Bar No. 169806)
2 Joshua C. Stokes (State Bar No. 220214)
CROWELL & MORING LLP
3 515 South Flower Street, 40th Floor
Los Angeles, CA 90071-2258
4 Telephone: (213) 622-4750
Facsimile: (213) 622-2690
Email: jmurray@crowell.com

Attorneys for Plaintiffs (additional attorney names on signature line)

Michael R. Lazerwitz (PRO HAC VICE)
Jeremy J. Calsyn (State Bar No. 205062)
Lee F. Berger (State Bar No. 222756)
CLEARY GOTTLIEB STEEN & HAMILTON LLP
2000 Pennsylvania Ave., NW
Washington, DC 20006
Telephone: (202) 974-1500
Facsimile: (202) 974-1999
Email: mlazerwitz@cgsh.com

Attorneys for Defendants
LG DISPLAY CO., LTD.
LG DISPLAY AMERICA, INC.

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)**

IN RE TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

This document related to all cases

CASE NO. M: 07-cv-1827-SI
MDL No. 1827

**STIPULATION AND
[PROPOSED] ORDER ON
BRIEFING SCHEDULE**

1 The undersigned counsel, on behalf of plaintiffs AT&T Mobility LLC, AT&T Corp.,
2 AT&T Services, Inc., BellSouth Telecommunications, Inc., Pacific Bell Telephone Company,
3 AT&T Operations, Inc., AT&T DataComm, Inc., Southwestern Bell Telephone Company, and
4 Motorola, Inc. (collectively, "Direct Action Plaintiffs"); and defendants AU Optronics
5 Corporation, AU Optronics Corporation America, Inc., Chi Mei Corporation, Chi Mei
6 Optoelectronics Corporation, Chi Mei Optoelectronics USA, Inc., CMO Japan Co., Ltd., Tatung
7 Company of America, Inc., LG Display Co., Ltd., LG Display America, Inc., Nexgen Mediatech,
8 Inc., Nexgen Mediatech USA, Inc., Samsung Electronics Co., Ltd., Samsung Semiconductor,
9 Inc., Samsung Electronics America, Inc., Sharp Corporation, Sharp Electronics Corporation,
10 Toshiba Corporation, Toshiba America Electronics Components, Inc., Toshiba Mobile Display
11 Co., Ltd., Toshiba America Information Systems, Inc., Epson Imaging Devices Corporation,
12 Epson Electronics America, Inc. (collectively, "Defendants") request that the Court enter the
13 following order to set the timing of the parties' respective oppositions and replies with regard to
14 Direct Action Plaintiffs' amended complaints.

15 WHEREAS Direct Action Plaintiffs filed amended complaints in the above-
16 captioned case on January 29, 2010, and Defendants filed a Motion to Dismiss on February 19,
17 2010;

18 WHEREAS Direct Action Plaintiffs and Defendants have agreed that an orderly
19 schedule for the response to the amended complaints would be most efficient for the parties and
20 for the Court;

21 WHEREAS a hearing is scheduled for June 4, 2010, which leaves nearly one
22 month between the current reply brief deadline and the hearing date; and

23 WHEREAS the Direct Action Plaintiffs and Defendants agree that both sides,
24 and the Court, will benefit from additional time to brief the complicated issues raised in this case
25 without moving the hearing date;

26 //

27 //

28 //

1 THEREFORE, Direct Action Plaintiffs and Defendants, by their respective
2 counsel, stipulate and agree to shift the response times by one week per side as follows:

3 1. Direct Action Plaintiffs' oppositions shall be due on April 16, 2010,
4 2. Defendants' replies, if any, shall be due on May ¹⁴ 24, 2010,
5 3. Except as set forth above, all Local Rules shall remain in effect with
6 respect to the briefing on the motions. Entering into this stipulation does not constitute a waiver
7 of any defense under Federal Rule of Civil Procedure 12.

8
9 IT IS SO STIPULATED

10 Respectfully submitted,

11 DATED: March 31, 2010

12 *Counsel for Plaintiffs Motorola, Inc.,*
13 *AT&T Mobility LLC, AT&T Corp.,*
14 *AT&T Services, Inc., Bellsouth*
15 *Telecommunications, Inc. Pacific Bell*
16 *Telephone Company, AT&T*
17 *Operations, Inc., AT&T DataComm,*
18 *Inc., and Southwestern Bell*
19 *Telephone Company*

20 By: /s/ Joshua C. Stokes

21 Jerome A. Murphy (*pro hac vice*)
22 Jeffrey H. Howard (*pro hac vice*)
23 CROWELL & MORING LLP
24 1001 Pennsylvania Avenue, N.W.
Washington, DC 20004
(202) 623-2500 (Phone)
(202) 628-5116 (Facsimile)

25 Jason C. Murray (State Bar. No. 169806)
26 Joshua C. Stokes (State Bar No. 220214)
27 CROWELL & MORING LLP
28 515 South Flower St., 40th Floor
Los Angeles, CA 90071
(213) 443-5582 (Phone)
(213) 622-2690 (Facsimile)

29 R. Bruce Holcomb (*pro hac vice*)
30 ADAMS HOLCOMB LLP
31 1875 Eye Street NW
32 Washington, DC 20006
33 (202) 580-8822 (Phone)
34 (202) 580-8821 (Facsimile)

1 *Counsel for Defendants LG Display*
2 *Co., Ltd. and LG Display America,*
3 *Inc., And on behalf of All Defendants*
4 *AU Optronics Corporation, AU*
5 *Optronics Corporation America, Inc.,*
6 *Chi Mei Corporation, Chi Mei*
7 *Optoelectronics Corporation, Chi*
8 *Mei Optoelectronics USA, Inc., CMO*
9 *Japan Co., Ltd., Tatung Company of*
10 *America, Inc., LG Display Co., Ltd.,*
11 *LG Display America, Inc., Nexgen*
12 *Mediatech, Inc., Nexgen Mediatech*
13 *USA, Inc., Samsung Electronics Co.,*
14 *Ltd, Samsung Semiconductor, Inc.,*
15 *Samsung Electronics America, Inc.,*
16 *Sharp Corporation, Sharp*
17 *Electronics Corporation, Toshiba*
18 *Corporation, Toshiba America*
19 *Electronics Components, Inc.,*
20 *Toshiba Mobile Display Co., Ltd.,*
21 *Toshiba America Information*
22 *Systems, Inc., Epson Imaging Devices*
23 *Corporation, Epson Electronics*
24 *America, Inc.*
25
26
27
28

By: *MLR/J*
Michael R. Lazerwitz (PRO HAC VICE)
Jeremy J. Calsyn (State Bar No. 205062)
Lee F. Berger (State Bar No. 222756)
CLEARY GOTTLIEB STEEN & HAMILTON
LLP
2000 Pennsylvania Ave., NW
Washington, DC 20006
Telephone: (202) 974-1500
Facsimile: (202) 974-1999

SO ORDERED

Susan Illston

Judge Susan Illston
4/6/10

Date Entered